

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO:  WAVE 8 CASES ON ATTACHED EXHIBIT A</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**PLAINTIFFS' *DAUBERT* MOTION TO PRECLUDE OR, IN THE ALTERNATIVE, TO  
LIMIT THE OPINIONS AND TESTIMONY OF CATHERINE MATTHEWS, M.D.**

**COMES NOW** Plaintiffs in actions listed on attached Exhibit A, by and through the undersigned attorneys, and files this Plaintiffs' *Daubert* Motion to Exclude or, In The Alternative, To Limit The Opinions And Testimony Of Catherine Matthews, M.D. and would respectfully show the Court that Dr. Catherine Matthews should be excluded for the following reasons:

1. Dr. Catherine Matthews is not qualified to offer general opinions on the adequacy of the TVT warnings, the design and scientific properties of the TVT mesh device, and her personal experience related to the safety and efficacy of the TVT mesh device.
2. In support of this motion, Plaintiffs have submitted a memorandum of law and also rely upon the following attached exhibits:
  1. A true copy of the Wave 8 TVT Expert Report of Catherine Matthews is attached hereto as Exhibit B.
  2. A true copy of the Curriculum Vitae of Catherine Matthews, M.D. is attached hereto as Exhibit C.
  3. A true copy of excerpts from the Deposition of Dr. Catherine Matthews dated March 24, 2016 is attached hereto as Exhibit D.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that the Court grant their *Daubert* Motion to Exclude or, In The Alternative, To Limit The Opinions And Testimony Of Catherine Matthews, M.D. Additionally, Plaintiffs request all other and further relief to which they may be justly entitled.

Dated: October 18, 2018

Respectfully submitted,

/s/ Thomas P. Cartmell

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing document on October 18, 2018, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

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